WHIDBEY TELEPHONE COMPANY
14888 SR 525
Langley, Washington 98260

Magalie R. Salas, Secretary
Federal Communications Commission
Washington, DC 20554

Attention: **Patrick Forster, Senior Engineer**
Policy Division
Wireless Telecommunications Bureau
3-A104

Re: **Report on Implementation of Wireless E911**
Phase II Automatic Location Identification
CC Docket 94-102

Dear Ms. Salas:

In accordance with the Commission's *Third Report and Order*, in CC Docket 94-102, released October 6, 1999, as modified by the Commission's *Fourth Memorandum Opinion and Order*, released September 8, 2000, we hereby submit this report of our plans for implementing a wireless Enhanced 911 (E911) Phase II automatic location identification (ALI) system, as follows:

Background/Contact Information

1. Carrier Identifying Information:

   Name of Carrier: Whidbey Telephone Company.
   TRS Number: 805746

2. Contact Information:

   Any inquiries concerning this report may be referred to:

   Harold Mordkofsky
   Blooston, Mordkofsky, Jackson & Dickens
   2120 L Street, N.W.
   Washington, D.C. 20037
   Tel. (202) 828-5520
   Fax (202) 828-5568

Whidbey Telephone Company (Whidbey) is the licensee of stations KNLG248 (F Block – Aberdeen, Washington BTA), KNLG841 (E Block – Bellingham, Washington BTA), KNLG842 (F Block – Bremerton, Washington BTA), KNLG843 (E Block – Port Angeles, Washington BTA) and KNLG844 (F Block – Port Angeles, Washington BTA) in the Broadband Personal Communications Service (PCS). These licenses were won in Auction No. 11 and granted on April 28, 1997. Accordingly, the first buildout deadline is April 28, 2002. Construction of the licensed facilities has not yet begun.

E911 Phase II Location Technology Information

Response to items 1-7:

We have not as yet determined the technology that will be used in the build-out of our licensed PCS systems, including whether we will use a network-based or handset- based solution to comply with the E911 Phase II ALI requirement. Once such a determination is made, we will file a supplemental report that will indicate the type of technology, as well as the equipment vendor(s), timetable for deployment, and program to ensure a successful implementation. Such report will be filed within 30 days of our implementation decision, in accordance with Rule Section 20.18(i). Testing to verify the Phase II capability will be conducted in accordance with the Empirical Testing Method in the Commission's *OET Bulletin No. 71* and the equipment manufacturers' requirements.

Whidbey is an incumbent local exchange service provider in rural areas in the state of Washington. Because of the higher per pop cost of a rural buildout, and reduced expectation of revenues (due to lower population density), we must be careful in choosing the technology and signaling format that we will use. We have been monitoring the progress of the various Phase II E911 technologies under development, and have obtained, through our consultants, basic information concerning network-based vendors such as Allen Telecom/Grayson Wireless Division, Cell-Loc, Inc./Times Three, Inc., TruePosition, Inc., U.S. Wireless Corp., and XYPOINT Corporation; handset-based vendors such as SnapTrack, Inc. and others such as Motorola, Inc., Nokia and Ericsson. We are also aware of a hybrid approach under development by FocuSystems, Inc. Based on this information, we have come to the following preliminary conclusions:

1. All of the above products are still under development, and we expect that all will progress significantly over the next 6 to 12 months. We believe that none of these vendors will be ready to promise delivery to smaller carriers of a finished

product by October 1, 2001, because the vendors are likely to concentrate first on the largest carriers. However, we expect that this situation will change substantially by the time we are ready to deploy Phase II technology, and we therefore believe that progress made in rolling out Phase II capabilities in urban areas will allow us to more rapidly deploy a proven technology in our rural service areas.

2. If we were implementing Phase II today, we would be concerned about the high cost of a network solution, as well as the problems associated with the use of triangulation and similar techniques in a rural setting, where towers are widely spaced and may be separated by uneven terrain. We would likewise be concerned with the scarcity of pricing and delivery information for handset ALI technology, and the fact that GPS solutions are generally limited by the ability of the handset to have a clear line-of- sight to the GPS satellite (which may limit the effectiveness of E911 calls made from indoors, heavily forested areas, etc.) Again, we are aware that the manufacturers are addressing all of these issues, and expect that they will be largely resolved by the time we deploy our system and receive a PSAP request for Phase II capability.

In order to ensure that we timely achieve compliance with the Commission's E911 requirements, once we have chosen our overall PCS technology, we will promptly evaluate the status, pricing and availability of all Phase II technologies at that time, and evaluate their effectiveness and feasibility based on the signaling format we have chosen. If we affiliate with other carriers based on our choice of format, the Phase II solution chosen by the affiliated carriers will be factored into our evaluation. We will also consult with industry sources, especially other rural telephone companies engaging in the provision of PCS, to determine which solution works best for rural areas. We will then decide on a vendor and proceed to implement the chosen solution in accordance with the Commission's Rules. It is contemplated that we will use customer mailings, bill inserts, store promotions and similar efforts to make our customers and potential customers aware of the availability and benefits of Phase II capability. Depending on the timing of our activation and related PSAP requests, our system may be Phase II compliant from the initiation of service, in which case it is expected that virtually all customers placed on the system will be Phase II capable.

Because we have not implemented service, we have not received any PSAP Phase I or Phase II requests, with respect to our authorized PCS systems, to date.

Upon the commencement of service to the public, we stand ready to comply with the dates established by the Commission and to otherwise implement E911 ALI Phase II. We will remain in contact with our local PSAPs and, as necessary, will update this report to keep the Commission apprised of our progress.

Respectfully submitted,

Whidbey Telephone Company

By /s/ David C. Henny
Officer

Dated: November 8, 2000